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January 14, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

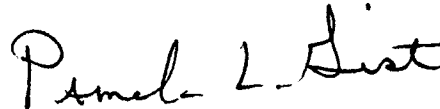
Re: **CC Docket 94-102**
Enhanced 911 Tier III Interim Report
Southern Illinois RSA Partnership
d/b/a First Cellular of Southern Illinois

Dear Ms. Dortch:

On behalf of the above-referenced carrier there is transmitted herewith a narrative statement regarding the company's E-911 deployment and implementation status. The filer is a Tier III carrier submitting its Interim Report in accordance with the provisions of the Commission's *Order to Stay*, CC Docket 94-102, FCC 03-241 (rel. October 10, 2003), as well as the Commission's *Order in Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order To Stay (rel. July 26, 2002) and the subsequent FCC Public Notice released June 30, 2003, DA 03-2113.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,



Pamela L. Gist

**Southern Illinois RSA Partnership
d/b/a First Cellular of Southern Illinois**

January 14, 2004

Interim Report of the Status of Enhanced 911 Phase II Compliance

Item I: Number of Phase I and Phase II Requests from PSAPs

Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois ("First Cellular") is delivering Phase I Enhanced 911 information services to all requesting PSAPs, except in Massac County where the PSAP continues to prepare to receive Phase I data. Of the twenty-four PSAPs in First Cellular's service area, seven have requested Phase II services, most recently Randolph County. The PSAPs are not yet ready to receive and utilize Phase II location data. However, First Cellular is in communication with the PSAPs for the exchange of information, updates and coordination of implementation schedules.

Item II: Carrier's Specific Technology Choice

First Cellular has elected to provide a network-based E911 Phase II solution. On November 10, 2003 First Cellular filed with the FCC a supplement to its pending petition for extension of the implementation schedule for Phase II E911 services, setting forth First Cellular's circumstances and need for additional time to deploy Phase II delivery services. First Cellular confirmed therein its decision to apply a network-based approach as a means to provide all customers with emergency location identification services.

Item III: Status of Ordering and/or Installation of Necessary Network Equipment

The base station and switching equipment for First Cellular's AMPS and CDMA cellular system is manufactured by Motorola, Inc. First Cellular will soon offer GSM services on a network supplied by Ericsson. Following protracted efforts to achieve technical compatibility and to fund substantial development and procurement costs for E911 Phase II, First Cellular has agreed to deploy a solution to be provided by Andrew Corporation, contingent upon research and development of a means by which to circumvent Motorola network system incompatibility. A lead option is to install a "Geometrix" system which will provide Phase II services on First Cellular's CDMA, AMPS and GSM networks. Andrew Corporation is presently customizing the research and development for First Cellular's E911 Phase II system, specifying all hardware and software necessary to implement a network-based solution. To date, Andrew Corporation has provided detailed equipment and site preparation proposals, network diagrams and project schedules.

First Cellular also continues to work with Farm Credit Leasing, a CoBank subsidiary, to obtain Phase II funding of about \$2,500,000 through execution of a capital lease agreement. Farm Credit Leasing is reviewing Andrew Corporation's price sheets and documentation prior to the release of funding. First Cellular expects the funding process to be completed with Farm Credit Leasing and purchase orders to be placed with Andrew Corporation within the coming weeks. First Cellular's E911 Phase II costs will be submitted to the State of Illinois. Provisions for eligibility for reimbursement remain under review by the State at this time.

Item IV: ALI-Capable Handset Availability

By providing a network-based solution First Cellular will create a Phase II capability that will provide system-wide enhanced ALI information from the commencement of implementation of First Cellular's Phase II network. The ALI-capability feature of a caller's individual handset will not be a factor in the delivery of Phase II data for any given call to 911.

Item V: Estimated Date on Which Phase II Service Will First Be Available

While First Cellular's network-based E911 Phase II system is expected to be installed within the next seven to twenty months, First Cellular presently projects that initial deployment will be achieved in the summer of 2004.

**Item VI: Information on Whether the Carrier Is on Schedule
to meet the Ultimate Implementation date of December 31, 2005**

First Cellular is working diligently to provide network-based E911 services within its cellular system. Therefore First Cellular will not be subject to the 95% penetration requirement to which handset-based carriers will be subject.

AFFIDAVIT

County of Jefferson

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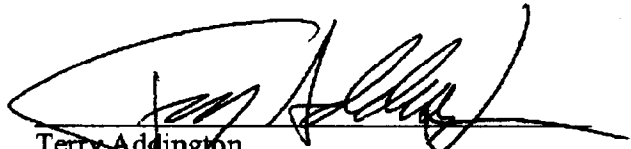
State of Illinois

I, Terry Addington, having been first duly sworn, depose and state as follows:

1. I am President and CEO of Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois.
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

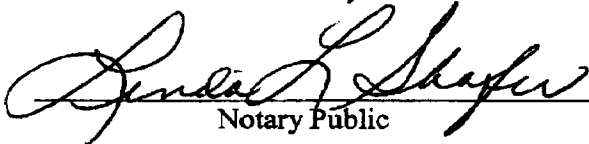
I declare under penalty of perjury that the foregoing is true and correct.




Terry Addington
President and CEO
Southern Illinois RSA Partnership
d/b/a First Cellular of Southern Illinois

Subscribed to and sworn to before me

this 9th day of January, 2004.


Notary Public

My commission expires:

CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 14th day of January, 2004, sent by hand-delivery, a copy of the foregoing Enhanced 911 Tier III Interim Report of Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois to the following:

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Federal Communications Commission
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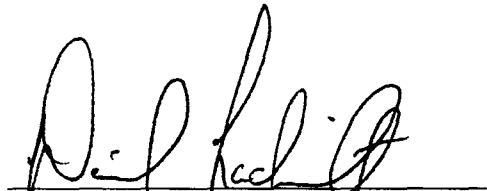
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Daniel Ladmirault

*via hand-delivery